

# **Exhibit D**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
v.	)
	)
STATE OF GEORGIA,	)
	)
Defendant.	)

**ERRATA TO REBUTTAL EXPERT REPORT OF  
ANDREW WILEY, Ph.D.**

October 19, 2023

The following corrections are made to the Rebuttal Expert Report of Andrew Wiley, Ph.D., dated September 1, 2023:

- On pages 4-5 of the report, the first full sentence after roman numeral V should read, “My opinions in this report are based on the following:
  - The reports of Drs. Amy McCart and Robert Putnam produced by the Department of Justice in this litigation;
  - The “Findings Letter” from the Department of Justice;
  - A review of relevant research and professional literature in special education and related disciplines;
  - My training and expertise in special education research and practice for students with behavior-related disabilities;
  - Professional reasoning grounded in my experience working with and supporting students with behavior-related disabilities and their teachers in schools;
  - Conversations with Georgia Department of Education staff and current and former GNETS directors;
  - Depositions of Jason Byars, Wina Low, Brooke Cole, and Cassandra Holifield;
  - Complaint, dated August 23, 2016 [Doc. 1];
  - State of Georgia’s Memorandum of Law in Support of Defendant’s Renewed Motion to Dismiss, or in the Alternative, for Stay of Proceedings, dated November 6, 2019 [Doc. 47-1];
  - Order on Defendant’s Motion to Dismiss, or in the Alternative, Motion to Stay Proceedings, dated May 13, 2020 [Doc. 61];
  - 2014 GNETS Manual; and
  - “Positive Behavioral Interventions and Supports,” Georgia Department of Education, available at <https://www.gadoe.org/Curriculum-Instruction-and-Assessment/Special-Education-Services/Pages/Positive-Behavioral-Interventions-and-Support.aspx>.”

